UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :

- v.- : 15 Cr. 643 (PKC)

JASON GALANIS,
JOHN GALANIS,
a/k/a "Yanni,"
JARED GALANIS,
GARY HIRST, and
DEREK GALANIS,

Defendants.

---x

**GOVERNMENT'S REPLY MEMORANDUM OF LAW
IN SUPPORT OF ITS MOTIONS IN LIMINE**

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In response to the Government's motion *in limine*, Jason Galanis ("Galanis" or "the defendant") fails to articulate a valid legal basis that would justify precluding admission at trial of [redacted] Accordingly, the Government respectfully requests that the Court grant the Government's motion *in limine* in its entirety.

ARGUMENT

I. The Defendant Fails to Articulate a Valid Basis to Preclude Admission of [redacted]

A. [redacted]

[redacted]

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[1] Galanis indicates that he does not, at this time, oppose the Government's motion for admission of evidence of the Securities and Exchange Commission ("SEC") bar prohibiting Jason Galanis from serving as an officer and director of a public company for a five year-period as direct evidence of the crimes charged in the Indictment. *See* Def. Br. at 1 n.2.

[redacted]

B. [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

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2 [redacted].

[redacted].

CONCLUSION

[redacted].

Dated: June 30, 2016
New York, New York

Respectfully submitted,

PREET BHARARA
United States Attorneys

By: /s/
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